



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 15, 2015

REGGIE VEGLIANTE, TREASURER  
TW TELECOM INC. POLITICAL ACTION  
COMMITTEE  
10475 PARK MEADOWS DRIVE  
LITTLETON, CO 80124

**Response Due Date**  
**04/20/2015**

IDENTIFICATION NUMBER: C00355941

REFERENCE: TERMINATION REPORT (02/01/2015 - 02/27/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule B of your report (see attached) discloses a contribution to "LEVEL 3 COMMUNICATIONS INC PAC" which appears to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a committee from making contributions to another political committee in excess of \$5,000 per calendar year. Records at the Commission, however, indicate that your committee may actually be affiliated with "LEVEL 3 COMMUNICATIONS INC PAC." As provided for in 11 CFR §100.5(g)(2), affiliated committees are those political committees established, financed, maintained, or controlled by the same group of persons including any parent, subsidiary, branch, division, department, or local unit thereof. Affiliated political committees may make and receive unlimited transfers amongst themselves which are not considered to be contributions. (11 CFR §102.6(a))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

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Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should be disclosed on Schedule A supporting Line 16 of the report covering the period during which the refund occurs.

Alternately, if "LEVEL 3 COMMUNICATIONS INC PAC" is affiliated with your committee, please clarify this relationship in writing and amend Line 6 of your Statement of Organization to identify it as an affiliated committee. 11 CFR §102.2 For future reporting, be aware that transfers made to affiliated committees should properly be disclosed on Schedule B supporting Line 22 of the Detailed Summary Page.

Although the Commission may take further legal action concerning the excessive contribution, your prompt action in obtaining a refund of the excessive amount, or further clarification of your relationship, if any, with "LEVEL 3 COMMUNICATIONS INC PAC" will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

2. Your committee has requested that the Commission permit your committee to terminate pursuant to 52 U.S.C. §30103(d) (formerly 2 U.S.C. §433(d)) and 11 CFR §102.3. In order to terminate your committee, you must file amendments to correct any problems on your February Monthly (1/1/15 - 1/31/15) and Termination (2/01/15 -2/27/15) Reports and/or on any previous reports that still contain uncorrected errors or omissions. If you are not certain about what corrections need to be made, please contact the undersigned analyst. Once the FEC receives and approves the corrections to your report(s), it will notify you. Until that time, you must continue to file all required reports.

- Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, Contributions to federal candidates and committees (PACs) should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 23, not Line 22 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action

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will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1144.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward D. Ryan". The signature is fluid and cursive, with the first name "Edward" and last name "Ryan" clearly distinguishable.

Edward Ryan  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions  
TW Telecom Inc. Political Action Committee (C00355941)**

**Excessive Contributions PAC to PAC**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
LEVEL 3 COMMUNICATIONS INC PAC	2/25/15	\$17,673.93	2015 Termination Report